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MEMO ENDORSED
September 11, 2014

## BY ECF

Hon. Kimba M. Wood United States District Judge Daniel Patrick Moynihan United States Courthouse 500 Pearl Street New York, New York 10007

Re: Zomba Recording LLC v. Camp West Recorders, Inc., et ano.

13 Civ. 6581(KMW)(GWG)

Dear Judge Wood:

We represent the plaintiff, Zomba Recording LLC ("Zomba"), in the above-referenced matter. I write with the consent of counsel for the defendants and on behalf of all parties to respectfully request an additional one-week extension of time within which to consummate the settlement of this matter. This is the parties' second request for such an extension.

By way of background, once the parties informed Magistrate Judge Gorenstein that they had reached an agreement in principle to resolve this matter in its entirety, the Court granted the parties' request for thirty (30) days within which to negotiate and agree upon relevant stipulations and settlement terms. The Court also ordered that the action be dismissed and discontinued without costs, and without prejudice to the right to reopen the action within thirty (30) days if the settlement were not consummated. On August 29th, the parties requested and the Court ultimately granted a one-week extension of this deadline, from September 4th to September 11th.

Since that time, the parties have continued to engage in negotiations concerning the terms of a written settlement agreement. While those negotiations have been fruitful, there remains one issue under discussion and upon which the parties must reach agreement before they can complete and circulate for execution, a final written settlement agreement. To enable the completion of this process, the parties request that the deadline for completing the settlement or, in the alternative, for Zomba to seek to reopen the action, be extended by one additional week, from September 11th to September 18th.

We thank the Court in advance for consideration of this request.

Respectfully submitted,

SO ORDERED:

N.Y., N.Y.

9-15-14

Adam W. Deitch

KIMBA M. WOOD U.S.D.J.

cc: Anthony R. Motta, Counsel for Defendants (by ECF and Electronic Mail)